

05-55 M

CD:DEW  
F.#2003R01893

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

MACK ANDINO,  
LAWRENCE BRIGGS,  
also known as "Jamal" and  
"Rahmel," and  
CHALITA DRAYTON,

Defendants.

-----X

THE GRAND JURY CHARGES:

COUNT ONE

In or about and between January 2000 and April 2003,  
both dates being approximate and inclusive, within the Eastern  
District of New York and elsewhere, the defendants MACK ANDINO,  
LAWRENCE BRIGGS, also known as "Jamal" and "Rahmel," and CHALITA  
DRAYTON, together with others, did knowingly and willfully  
conspire to defraud an agency of the United States, to wit: the  
Internal Revenue Service ("IRS"), by obtaining and aiding others  
to obtain the payment of false, fictitious and fraudulent claims,  
to wit: tax refunds.

(Title 18, United States Code, Sections 286 and 3551 et  
seq.)

INDICTMENT

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 286,  
287, 2 and 3551 et seq.)

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2005 MAR 29 PM 3:14

COUNTS TWO THROUGH FIFTEEN

On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendants MACK ANDINO, LAWRENCE BRIGGS, also known as "Jamal" and "Rahmel," and CHALITA DRAYTON, together with others, did knowingly and intentionally make and present claims upon and against an agency of the United States, to wit: the IRS, which claims the defendants knew to be materially false, fictitious and fraudulent, in that the defendants listed below filed and caused to be filed with the IRS fraudulent Individual Income Tax Returns in the names of the taxpayers listed below, whose identities are known to the Grand Jury, which returns claimed refunds of taxes in the amounts listed below, knowing such claims to be false, fictitious and fraudulent:

COUNT	DEFENDANTS	TAXPAYER NAME	TAX YEAR	DATE FILED	REFUND CLAIM
TWO	ANDINO	John Doe #1	1999	April 15, 2000	\$4,779
THREE	ANDINO	John Doe #1	2000	April 15, 2001	\$5,250
FOUR	ANDINO	Jane Doe #1	1999	April 15, 2000	\$1,822
FIVE	ANDINO and BRIGGS	Jane Doe #2	2001	April 15, 2002	\$4,011
SIX	ANDINO and BRIGGS	Jane Doe #3	2002	April 15, 2003	\$4,992
SEVEN	ANDINO and BRIGGS	Jane Doe #4	2001	April 15, 2002	\$3,379
EIGHT	ANDINO and BRIGGS	Jane Doe #5	2002	April 15, 2003	\$1,433
NINE	ANDINO and DRAYTON	CHALITA DRAYTON	2000	April 15, 2001	\$1,665

COUNT	DEFENDANTS	TAXPAYER NAME	TAX YEAR	DATE FILED	REFUND CLAIM
TEN	ANDINO and DRAYTON	CHALITA DRAYTON	2001	April 15, 2002	\$1,321
ELEVEN	ANDINO and DRAYTON	CHALITA DRAYTON	2002	April 15, 2003	\$2,080
TWELVE	ANDINO and DRAYTON	John Doe #2	2000	April 15, 2001	\$2,814
THIRTEEN	ANDINO and DRAYTON	John Doe #2	2001	April 15, 2002	\$2,063
FOURTEEN	ANDINO and DRAYTON	Jane Doe #6	2001	April 15, 2002	\$1,425
FIFTEEN	ANDINO and DRAYTON	Jane Doe #6	2002	April 15, 2003	\$1,997

(Title 18, United States Code, Sections 287, 2 and 3551

et seq.)

A TRUE BILL

FOREPERSON

*Roslynn R. Mauskopf*  
ROSLYNN R. MAUSKOPF  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

A TRUE COPY	
ATTEST	
DATED <i>March 24</i> 2005	
ROBERT C. HEDERMANN	
BY <i>Christy Connell</i>	CLERK
DEPUTY CLERK	